

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE F. ROSARIO RODRIGUEZ
MARIA DEL C. GONZALEZ COTTO

DEBTOR(S)

CASE NUMBER: 10-05921 ESL

CHAPTER 13 ASSET CASE)

DEBTORS REPLY TO TRUSTEE'S UNFAVORABLE REPORT
ON PROPOSED POST CONFIRMATION PLAN MODIFICATION

TO THE HONORABLE COURT:

COMES now Debtor(s) represented by the undersigned counsel
and respectfully Allege(s) and Pray(s) as follows:

1. On March 3rd, 2011, debtor filed a post confirmation
modification. (Docket #36)

2. On March 7th, 2011, the Trustee filed an unfavorable
report based on Debtor still owed evidence of unemployment
benefits and evidence of Christmas bonus payment to the Trustee.
(Docket #37)

3. On March 7th, 2011, Debtor upload to Trustee evidence of
joint debtor unemployment benefits. Exhibit I.

4. On March 24th, 2011, Debtor upload to Trustee evidence
of the payment of \$1,550.00 that is the half benefit of Christmas
bonus. Exhibit II

5. Both upload taking care of the issues raised by the
Trustee.

NOTICE

"Parties in interest are notified the have twenty one (21) days to reject a proposed modification of a plan and request a hearing. If no opposition is filed within the prescribed period of time, the Court will enter and order granting the motion upon the filing of a certificated of service by the movant that adequate notice was given. Should and apposition be timely filed. The Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections shall be denied".

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Trustee's unfavorable report.

In San Juan, Puerto Rico, this 1st, day of March 2011.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA

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P.O. Box 19559
San Juan, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144
E-mail valdeslaw@prtc.net



Chapter 13 Trustee
Alejandro Oliveras

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Validate Case Number
Selection Title
Upload Document
Summary
Finish

Step 4: Summary Upload

Case Number: 1005921
Document Title: Payment Stubs
Filename: Bono Navidad.pdf
Date and time: 03-24-2011 3:02:20 PM

Finish



Notice to Purchaser: As a condition to this institution's issuance of this check, Purchaser agrees to provide an indemnity Bond prior to the refund or replacement of this check in the event it is lost, misplaced, or stolen.

Check No. 807226

1517 47/2215

Date: 03/24/2011

DRAWN ON
FIRSTBANK PUERTO RICOPURCHASER'S COPY **MANAGER'S CHECK**

Purchaser: JOSE ROSARIO RODRIGUEZ

Payee: ALEJANDRO OLIVERAS RIVERA

Branch: 037

Teller: 09436

Source:

Amount: \$1,550.00

Fee: \$8.00

Total: \$1,558.00

THIS MULTICOLOR SECURITY CHECK CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM.

**Manager's Check**

Check No. 807226

101 147/2215

Date: 03/24/2011

Purchaser: JOSE ROSARIO RODRIGUEZ

Pay ***One Thousand Five Hundred Fifty Dollars*****

To The
Order of: ALEJANDRO OLIVERAS RIVERA
\$1,550.00
 DOLLAR-ONE THOUSAND FIVE HUNDRED FIFTY ZERO PERIOD ZERO ZERO

Valid for Six Months After Issue Date

Branch 037 Teller No. 09436

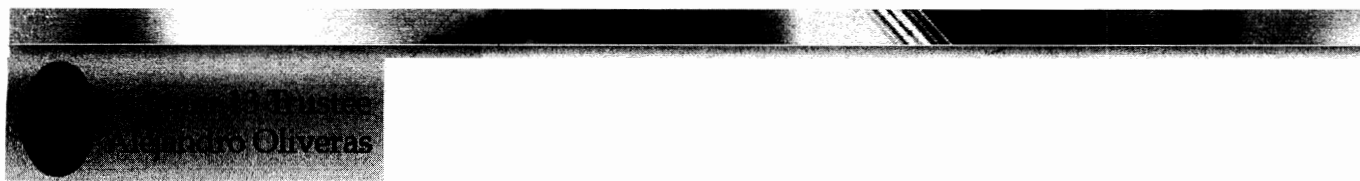
 DRAWN ON FIRSTBANK
 SAN JUAN, PUERTO RICO

3-5001-0100

⑈807226⑈ ⑆221571473⑆ 37⑈3000015⑈

LQ

10-5921

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Validate Case Number

Selection Title

Upload Document

Summary

Finish

Step 4: Summary Upload

Case Number: 1005921

Document Title: Income evidence (other
than paystubs)

Filename: Desempleo.pdf

Date and time: 03-07-2011 1:17:47 PM

[Finish](#)

MAR-08-2011 00:05 From:

To: 7877630144

Page: 1/1

Page: 1 Document Name: untitled

DEPARTAMENTO DEL TRABAJO Y RECURSOS HUMANOS
INFORMACION AL TRABAJADOR SOBRE RECLAMACION DE SEGURO POR DESEMPLEO

SEG. SOC.: 581 15 8991

NOMBRE :

DIRECC. :

DE ACUERDO A SU SOLICITUD SE CERTIFICA:

1. RADICO SOLICITUD DE BENEFICIOS POR DESEMPLEO EL Y
RESULTO ELEGIBLE A UN BENEFICIO SEMANAL DE \$
A LA FECHA DE ESTA CERTIFICACION:
 - A. AGOTO SUS BENEFICIOS
 - B. DESCALIFICADO HASTA
 - C. ULTIMA SEMANA RECLAMADA
 - D. HA RECIBIDO BENEFICIOS POR SEMANAS
2. RADICO SOLICITUD DE BENEFICIOS EL Y FUE DETERMINADO INELEGIBLE
- X 3. NO EXISTE SOLICITUD DE BENEFICIOS POR DESEMPLEO PARA ESE SEG. SOC.
4. OTRAS: _____

FIRMA AUTORIZADA: _____

FECHA : _____

NO HAY RECORD EN ARCHIVO MAESTRO

REGULADO DE SEGURIDAD DE EMPLEO

División de Seguro por Desempleo

Call Box Núm. 4576

Caracas, Puerto Rico 00626-4576

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

10-05921-ESL13 Notice will be electronically mailed to:

ALANE A BECKET on behalf of Creditor ECAST SETTLEMENT CORP
notices@becket-lee.com

MONSITA LECAROS ARRIBAS
ustpreion21.hr.ecf@usdoj.gov

OSMARIE NAVARRO MARTINEZ on behalf of Trustee ALEJANDRO OLIVERAS RIVERA
aorecf@chl3sju.com

ALEJANDRO OLIVERAS RIVERA
aorecf@chl3sju.com

VANESSA M TORRES QUINONES on behalf of Creditor BANCO POPULAR PR (VTQ)
mbaldera@martineztorreslaw.com, jrico@martineztorreslaw.com;
vtorres@martineztorreslaw.com; tvazquez@martineztorreslaw.com;
quiebrasmt@gmail.com

MARILYN VALDES ORTEGA on behalf of Debtor JOSE ROSARIO RODRIGUEZ
valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

10-05921-SEK13 Notice will not be electronically mailed to:

BANCO POPULAR DE PR
PO BOX 36-6818
SAN JUAN, PR 00936-6818

INTERNAL REVENUE SERVICE
PO BOX 21126
PHILADELPHIA, PA 19114-0326

FIA CARD SERVICES
PO BOX 15019
WILMINGTON, DE 19886-5019

JC PENNEY
PO BOX 960090
ORLANDO, FL 32896-0090

FIRST BANK
PO BOX 19327
SAN JUAN, PR 00910-1427

PUERTO RICO TELEPHONE COMPANY
#562 AVE JUAN PONCE DE LEON
HATO REY, PR 00918

FIRSTBANK
PO BOX 9146
SAN JUAN, PR 00908-0146

SEARS
P.O. BOX 183114
COLUMBUS, OH 43218-3114